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Las Vegas Gaming, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CATELYN H., pseudonymously,

Plaintiff,

v.

VENETIAN LAS VEGAS GAMING, LLC, BOYD
GAMING CORP., and THE MIRAGE CASINO –
HOTEL, LLC,

Defendants.

Case No. 2:24-cv-00939-JCM-DJA

**STIPULATION AND ORDER TO
STAY DISCOVERY**

1 Plaintiff CATELYN H. and Defendants VENETIAN LAS VEGAS GAMING, LLC
2 (“Venetian”), BOYD GAMING CORP. (“Boyd”), and THE MIRAGE CASINO – HOTEL, LLC
3 (“Mirage”) (collectively the “Parties”), by and through their respective counsel of record, hereby
4 agree and stipulate as follows:

5 On July 11, 2024, Plaintiff filed her first amended complaint (ECF No. 55). On July 25,
6 2024, Venetian, Boyd, and Mirage filed motions to dismiss Plaintiff’s first amended complaint
7 (ECF Nos. 57-59). On August 15, 2024, Plaintiff filed her response to the various motions to
8 dismiss her first amended complaint (ECF No. 66).

9 In the interests of judicial economy and to avoid incurring potentially unnecessary
10 attorneys’ fees and costs, the Parties agree that discovery should be stayed pending the Court’s
11 ruling on the aforementioned Motions to Dismiss. Good cause exists for a stay of discovery. First,
12 the Motions to Dismiss are still pending before this Court, and no fact discovery is needed to
13 resolve these Motions seeking the complete dismissal of Plaintiff’s Complaint. Additionally, any
14 discovery in this case would involve the production of records involving a Plaintiff who alleges
15 she is a survivor of human trafficking. Plaintiff believes that maintaining her privacy is crucial at
16 this point, and any stay would obviate the need for a disclosure of her identity until the pending
17 Motions to Dismiss are decided. Any discovery would necessarily involve highly sensitive
18 documents related to Plaintiff, including her identity.

19 A stay while the Motions to Dismiss are pending is therefore consistent with this Court’s
20 holding in *Schrader v. Wynn Las Vegas, LLC*, No. 2:19-cv-02159, 2021 WL 4810324 (D. Nev. Oct.
21 14, 2021), as it will maximize Plaintiff’s interest in maintaining her privacy, as well as conserve
22 judicial resources and avoid unnecessary costs. *See id.* at *5 (granting stay motion because a party
23 “demonstrated harm or prejudice will result if discovery proceeds now” and “good cause exists to
24 continue the stay of discovery”); *see also* Order Granting Stipulation to Stay Discovery, *C.C. v.*
25 *Rashid et al.*, No. 2:23-cv-02056 (D. Nev. Apr. 30, 2024), ECF No. 96 (staying case with similar
26 human trafficking allegations pending the Court’s decision on pending motions to dismiss); Order
27
28

Granting Stipulation to Stay Discovery, *S.C. v. Hilton Franchise Holding LLC et al.*, No. 2:23-cv-02037 (D. Nev. May 6, 2024), ECF No. 52 (same).

To the extent that the Court's decisions on the Motions to Dismiss do not fully dispose of this matter, the Parties agree that a discovery plan and proposed scheduling order shall be due within thirty (30) days of the Court's decision on the Motions to Dismiss.

The Parties further discussed and intend to propose a one (1) year discovery period commencing as of the date of the Court's ruling on the Motions to Dismiss.

IT IS SO STIPULATED.

Dated: September 10, 2024

KEMP JONES LLP

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IT IS SO ORDERED.

DATED: 9/12/2024



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE